

Coluccio, Tina (DEQ)

From: Ringuette, Lindsey (DEQ)
Sent: Tuesday, August 28, 2012 12:53 PM
To: Tornberg, David (TI); rsnewberger@horizonenv.com
Cc: Nutini, Jennifer (TI); Maki, Joe (DEQ); Coluccio, Tina (DEQ); Casey, Steve (DEQ)
Subject: Humboldt Mill Storm Water Drainage Plan and Characterization Study
Attachments: General Purpose Letter_171932_v1.doc

Hey Dave and Bob,

It was great to meet with both of you on August 14th at the Humboldt Mill facility to review the new storm water drainage plan and changes to the short-term storm water characterization study.

In regards to the new drainage plan, we discussed that storm water will be separated topographically on the site so that some will flow west and north to the Humboldt Pit, and some will flow west and south to the newly construction sedimentation basin. The storm water that will flow to the pit is considered "contact" storm water, as it will have come into contact with some part of the operations, whether it be material handling, storage, loading/unloading, etc... The storm water that will flow to the sedimentation basin is for the most part considered "non-contact" storm water, as it will coming from the administration building and parking areas, and general facility grounds. The "contact" storm water that enters the pit will be treated through the wastewater treatment facility, which is scheduled to be built in the spring of 2013.

In reviewing past conversations with Jen in regards to the Short-Term Storm Water Characterization Study (STSWCS), we had already made a decision not to sample during cleanup/construction activities, as the sample would not provide an adequate representation of facility operations. The site is constantly changing, and taking a sample during this constant state of change would only represent the site during that moment in time. Measures are being installed to provide for the proper treatment and drainage of storm water.

In January of this year, I sent an email to Jen containing the following statement:

"You are correct in what is required; we require at least 3 sampling events, and in this case, one sampling event was completed prior to cleanup, and two more are expected to be completed post-cleanup. Hopefully cleanup will be completed so that one of these post-cleanup sampling events can occur during spring snowmelt; with the other after a significant rain event (as you stated below, and as described in KEMC's approved storm water sampling plan). If that doesn't occur, the two post-cleanup sampling events will simply have to occur during two separate significant rain events (as described in the plan) at some point after that.

Given this information, I think it would be best to extend the deadline until October 26, 2012."

At this time it was anticipated that cleanup would be completed prior to spring. However, after review of the site with you both on August 14th, it has been determined that cleanup and

construction are one of the same at this point, and that the site is still constantly changing, and will continue to do so until construction is complete; which is estimated to be the fall of 2013. Also, given that the drainage plan has been changed, some outfalls have been or will be eliminated. Given this situation, it would not make sense to conduct further sampling until construction is complete and the site is stabilized with permanent measures.

The permit in which this sampling is required under is NPDES permit number MI0058649; which expires October 1, 2014. Please see the attached letter that I had sent approving the storm water monitoring plan, and in particular, the second paragraph that states the following:

"...Therefore, the SWMP submitted for the Kennecott-Humboldt Mill facility is hereby approved. As discussed, this SWMP will characterize the storm water at the facility in its current non-operational state, and the SWMP will be combined with the overall Part 632 surface water monitoring plan prior to operations at the mill..."

So eventually this study will change so that it can properly characterize storm water at the facility during its operational phase. Given that the purpose of this study is to characterize the storm water prior to operations, that the landscape at the facility is constantly changing due to cleanup and construction, that cleanup and construction should be completed by the end of 2013, and that the permit does not expire until October 1, 2014; I recommend the following:

Staff of KEMC should wait for cleanup and construction to be completed. Once this is completed, which will hopefully be the fall of 2013, staff of KEMC should re-evaluate the storm water outfalls to determine which ones have been eliminated, which ones remain, and if any new ones were created. Once the number and location of storm water outfalls has been determined, conduct 2 more sampling events (maybe fall 2013 rains and spring 2014 snowmelt, if this timeframe is accurate; if not possible, just two more events that meet the sampling criteria). This data should be compiled with the pre-cleanup/pre-construction data that was already taken and submitted in report form to the DEQ as stated in the permit requirements.

Given this recommendation, I am extending the deadline to July 1, 2014. I understand that this is a long way out; however, we would like to characterize the storm water prior to the mill's operational phase so that if any issues are detected, they can be resolved prior to facility start-up.

Please contact me if you have any questions, or if there are any changes you feel would improve this process.

Thanks.

Linds

FILE: NPDES, Marquette County, Humboldt Mill (paper file and NMS)

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JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENT
LANSING



REBECCA A. HUMPHRIES
DIRECTOR

October 26, 2010

Ms. Kristen Mariuzza
Environmental & Permitting Manager
Kennecott Eagle Minerals
504 Spruce Street
Ishpeming, Michigan 49849

Dear Ms. Mariuzza:

SUBJECT: National Pollutant Discharge Elimination System (NPDES)
Permit No. MI0058649
Designated Name: Kennecott-Humboldt Mill
Storm Water Monitoring Plan

Staff of the Michigan Department of Natural Resources and Environment (DNRE), Water Resources Division (WRD), has received the additional information as requested in a letter sent to you on September 23, 2010. The revised Storm Water Monitoring Plan (SWMP) submitted for the Kennecott-Humboldt Mill facility, located at 4547 County Road 601, Champion, Michigan, now includes the necessary criteria for approval required under NPDES permit number MI0058649.

Therefore, the SWMP submitted for the Kennecott-Humboldt Mill facility is hereby approved. As discussed, this SWMP will characterize the storm water at the facility in its current non-operational state, and the SWMP will be combined with the overall Part 632 surface water monitoring plan prior to operations at the mill.

If you have any questions, please contact me via telephone at the number below, via email at ringuettel@michigan.gov, or via mail at DNRE – WRD, Gwinn District Office, 420 5th Street, Gwinn, Michigan 49841.

Sincerely,

Lindsey Ringuette
Upper Peninsula District Office
Water Resources Division
906-346-8518

LR:TC

cc: File: NPDES, Marquette County, Kennecott-Humboldt Mill